

With regard the 7-7.3 MHz band, the ARRL has broken its own pattern in assigning bandwidth (BW) on other bands, and suggested a reduction in the narrow-bandwidth (typically, the A1 emission) segment that doesn't take into account the current activity levels on that band, which is very heavily used day and night for telegraphy. In fact, the telegraphy subband is already suffering from severe congestion from European radioteletype and Central American telephony, and opening that segment to further intrusion by digital modes would be a serious mistake. Furthermore, the proposed allocation of 7.000-7.035 MHz would leave only 10 KHz for radiotelegraphy operation by non-Extra Class licensees, where they currently enjoy 125 KHz. This is a radically reduced, even punitive allocation for the second-most popular mode on the HF bands. Still, there is no doubt that digital modes need more allocation. As a compromise, and consistent with the proposed re-segmentation on other bands, I would suggest the 200 Hz BW segment be allocated at 7.000-7.065 MHz, the 500 Hz BW segment be allocated at 7.065 - 7.115 MHz, and the 3.5 KHz BW segment at 7.115 - 7.300 MHz.

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